



THE CITY OF NEW YORK
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June 1, 2018

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Restaurant Law Center v. The City of New York, et al.
17-cv-09128 (PGG)(JLC)

Dear Judge Gardephe:

This office represents Defendants in the above-captioned matter, in which Plaintiffs challenge the City's enactment and enforcement of New York City Administrative Code §§ 20-1301, *et seq.* ("Deductions Law"). Briefing on the parties' respective motions for summary judgment was completed and the motions fully submitted on March 2, 2018 (briefing on the amicus curiae motion was completed on March 26, 2018), and no party has requested oral argument.

In accordance with Rule IV.H of Your Honor's Individual Rules of Practice, the parties respectfully call the Court's attention to the fact that the parties' motions have been fully submitted for ninety (90) days and have not yet been decided.

Presently, enforcement of the Deductions Law and its associated rules have been stayed until the earlier of (i) a determination of Plaintiffs' motion and Defendants' cross-motion, or (ii) June 8, 2018. However, since the Deductions Law expires by its own terms in November 2019, any further stay of the law significantly limits the law's impact. Accordingly, Defendants respectfully request that the Court expedite its consideration of the parties' papers. Intervenors join in this request for an expedited decision, and Plaintiffs do not oppose this request for expedited consideration.

Thank you for your consideration of the foregoing.

Respectfully submitted,

/s

Emily K. Stitelman
Assistant Corporation Counsel

cc: All counsel of record (via email)